



STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF LIBRARIES

April 21, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Modernizing the E-rate Program for Schools and Libraries WC Docket No. 13-184**

Dear Secretary Dortch:

The E-rate Program provides critical support for digital learning and public access to online information through America's 16,415 public libraries. For this reason, the Oklahoma Department of Libraries welcomes the Federal Communications Commission's (FCC) efforts to update the program and supports the American Library Association's (ALA) proposal to advance cost-efficient library network development via technical support enabled by state library agencies.

State library agencies provide a critical link between federal policies and local, independent library systems, many of which have limited information technology (IT) staff in place to support network planning and broadband procurement. In Oklahoma for instance, staff from our Library Development office work with the public libraries in the state to help our smaller, rural libraries understand the federal e-rate filing process and check in with them often during the filing process to foster timely and complete application submissions. Our smallest public library serves a population of 277 people in a remote area of the state. As a department of city government, the IT staff are vendors on contract who commute to the community as needed. The people with the greatest need for technical assistance in our state have the lowest ability to pay for it.

We believe this demonstration project can bring multiple benefits to our state(s), including:

- increase knowledge at both the local and state level of barriers to high-capacity broadband to and within library buildings;
- allow the state library agency to look across libraries of different sizes and circumstances to identify common concerns, bulk purchasing opportunities and other interventions;
- increase local library participation in the E-rate program and/or improve purchasing decisions through the E-rate program; and
- provide evaluation of interventions to better inform future action by the Commission or other entities supporting local library technology.

This two-year demonstration will directly support library E-rate applicants in the near-term, as well as increase opportunities for developing state, regional and national solutions over the longer term.

In our filing with the FCC on March 13th regarding WC Docket No. 13-184 regarding a pilot project in Oklahoma to fund network analysis and remediation, we provided the following example of the improvements in broadband delivery to the customer after our funding technical assistance for these libraries:

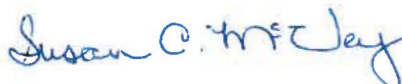
Library	Higher Broadband through Grant	Actual Speed test from Assessment	Speed attained after Remediation
Miami	45 Mbps	17 Mbps	38 Mbps
Okmulgee	100 mbps	10.25 -22.14 Mbps	83 – 86 Mbps
Wagoner	45 Mbps	17 -21 Mbps	48 Mbps
Woodward	45 Mbps	4.23 – 16.53 Mbps	38 – 40 Mbps
El Reno	100 Mbps	Wireless general area 21Mbps Wireless video Conference room 1 Mbps	Wireless general area 45 Mbps Wireless video conference room 45 Mbps

We strongly support the American Library Association proposal and believe it will provide similar examples of the improvements that can be made at the local level that will benefit all public libraries and the customers they serve. The lessons learned in our pilot and the one proposed by the American Library Association will be widely shared and can guide the work of state library staff with local libraries as well as inform the FCC of potential future eligible services to be covered by e-rate.

Lack of dedicated IT staff is one of the challenges libraries in my state often face. Another is lack of affordable access to scalable, high-capacity broadband. We welcome the opportunity to work with our local libraries to identify potential school partners and broadband providers that, with limited special construction, may greatly increase capacity and reduce costs.

Our nation's libraries represent an investment in lifelong learning and internet access for all—especially for the roughly 30 percent of Americans who lack home broadband access. The E-rate program is the engine powering much of our work to ensure no one is excluded from digital opportunity. The Oklahoma Department of Libraries and libraries across our state look forward to continue helping fulfill our nation's Universal Service goals through a future-focused and robust E-rate 2.0. Thank you for the opportunity to comment and for your consideration of our recommendations.

Sincerely,



Susan C. McVey, Director
Oklahoma Department of Libraries